

CRAIG A. EDMONSTON, Esq. S.B.N. 128694  
LAW OFFICES OF CRAIG A. EDMONSTON  
2204 Truxtun Avenue, Bakersfield, CA 93301  
Phone (661) 324-1110 Fax (661) 324-1571

KYLE J. HUMPHREY, Esq. S.B.N. 118477  
THE LAW OFFICES OF KYLE J. HUMPHREY  
2211 17th Street, Bakersfield, CA 93301  
Phone (661) 327-1360

Attorney for Plaintiff,

SUPERIOR COURT OF CALIFORNIA COUNTY OF KERN  
METROPOLITAN DIVISION

CRAIG HARRISON,  
Plaintiff,  
v.  
JUSTIN GILLIGAN aka RYAN DIXON and  
DOES 1-50 Inclusive,  
Defendants.

CASE NO.: BCV-19-102587

COMPLAINT FOR DAMAGES FOR  
DEFAMATION (LIBEL and SLANDER);  
CIVIL CODE SECTION 3294

COMES NOW, plaintiff, CRAIG HARRISON and complains and allege as follows:

1. Plaintiff, is and at all times mentioned herein was a resident of the County of Kern, State of California.
2. Plaintiff is informed and believes that at all times mentioned herein, defendant JUSTIN GILLIGAN aka RYAN DIXON was an individual doing business in the County of Kern, State of California.
3. The true names, identities and capacities of defendants designated herein as DOES 1 through 50, Inclusive and each of them are presently unknown to plaintiff. Plaintiff

will amend this complaint to substitute the true names of said defendants, and each of them, when such true names, identities and capacities are ascertained.

4. Plaintiff alleges that at all times herein mentioned defendants JUSTIN GILLIGAN aka RYAN DIXON and DOES 1-50 and each of them were the agents, employees, representatives, partners and co-venturers of each of the remaining defendants and committed all acts and omissions alleged herein in the course and scope of such agency and employment.

5. On or about May 21, 2019 and July 31, 2019 and thereafter, defendants JUSTIN GILLIGAN aka RYAN DIXON and Does 1-50 and each of them negligently and maliciously published and re-published false, defamatory, libelous, and slanderous statements including allegations of sexual misconduct of and concerning plaintiff CRAIG HARRISON. The subject false, defamatory, libelous and slanderous statements included but were not limited to "that I am a victim of his inappropriate touching, lies, manipulation and abuse of power"; "I witnessed him being inappropriate with children, giving gifts and money, saying sexual jokes, touching and being alone with them"; "I have also witnessed him taking advantage and controlling lives of younger men entrusted to him that had drug or alcohol problems"; "he made sexual advances toward me which I rejected which caused tension through the years".

6. Plaintiff alleges that the above statements and all of them were false, defamatory, libelous and slanderous on their face and were made negligently and maliciously and with reckless disregard for the falsity (serious doubts as to the truth) of the allegations. As a result of the publication and re-publication of the aforementioned defamatory, false, libelous and slanderous statements, plaintiff CRAIG HARRISON has sustained permanent damage and injury to his good name

1 and reputation and has incurred and will continue to incur general and non-economic  
2 damages for emotional distress, worry, anxiety, fear and humiliation in an amount  
3 according to proof.  
4

5 7. As a further legal result of the publication and re-publication of the aforementioned  
6 false, defamatory libelous and slanderous statements, plaintiff CRAIG HARRISON  
7 has sustained special and economic damages for past present and future special and  
8 economic damages including medical bills, loss of income and impairment of  
9 earning capacity in an amount according to proof.  
10

11 8. As a further legal result of the publication of the aforementioned false, defamatory,  
12 libelous and slanderous statements, plaintiff CRAIG HARRISON has sustained  
13 presumed damages in the amount according to proof.  
14

15 9. The publication and re-publication of the aforementioned false, defamatory, libelous  
16 and slanderous statements was done with malice, oppression and reckless disregard  
17 for and serious doubts of the truth of the statements thereby entitling plaintiff CRAIG  
18 HARRISON to an award of exemplary and punitive damages against said defendants  
19 pursuant to *California Civil Code Section –3294, et seq.* in an amount according to  
20 proof.  
21

22 Wherefore, plaintiff, CRAIG HARRISON demands judgment against defendants JUSTIN  
23 GILLIGAN aka RYAN DIXON and DOES 1-50 and each of them, as follows:  
24

- 25 1. For general and non-economic damages in an amount according to proof;
- 26 2. For special damages and economic damages in an amount according to proof;
- 27 3. For presumed damages in an amount according to proof;
- 28 4. For exemplary damages in an amount according to proof;

5. For costs of suit;

6. For such other and further relief as the court deems just and proper.

Dated: September 11, 2019

LAW OFFICES OF CRAIG A. EDMONSTON

By: Craig A. Edmonston, Esq.  
Attorney for plaintiff, Craig Harrison